

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

REVERSE MORTGAGE INVESTMENT
TRUST INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11225 (MFW)

(Jointly Administered)

**NOTICE OF *AMENDED*² AGENDA OF MATTERS SCHEDULED FOR
VIDEOCONFERENCE HEARING ON NOVEMBER 2, 2023 AT 2:00 P.M. (ET)**

THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM AND
REQUIRES ALL PARTICIPANTS TO REGISTER IN ADVANCE.
COURTCALL WILL NOT BE USED TO DIAL IN.

PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:

[https://debuscourts.zoomgov.com/meeting/register/vJItd-
GsrDliGpNSem2UD9m0nh5RAaJyDL4](https://debuscourts.zoomgov.com/meeting/register/vJItd-GsrDliGpNSem2UD9m0nh5RAaJyDL4)

ALL INTERESTED PARTIES SHOULD BE REGISTERED AND CONNECTED BY
THE HEARING TIME.

ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL
CONTAINING PERSONAL LOG-IN INFORMATION FOR THE HEARING.

RESOLVED MATTER:

1. [Third \(Non-Substantive\) Omnibus Objection to Claims](#) [Dkt. No. 840; filed July 31, 2023]

Objection/Response Deadline: August 14, 2023 at 4:00 PM (ET); extended to
September 7, 2023 at 4:00 PM (ET) only as to
Fannie Mae

Objections/Responses:

A. Informal response from Fannie Mae

¹ The Debtors in these Cases, along with the last four digits of each Debtor's federal tax identification number, include: Reverse Mortgage Investment Trust Inc. (3421); Reverse Mortgage Funding LLC ("RMF") (0209); RMIT Cash Management LLC (6241); RMIT Operating I LLC (1844); and RMIT Operating II LLC (2301). The location of the Debtors' service address for purposes of these Cases is: 1455 Broad Street, 2nd Floor, Bloomfield, NJ 07003.

² Amended items appear in bold.

B. Informal response from claimant Preston Lopez Jackson

Related Documents:

- C. [Notice of Submission of Proofs of Claim](#) [Dkt. No. 849; filed September 11, 2023]
- D. [Notice of Revised Proposed Order Granting Plan Administrator's Third \(Non-Substantive\) Omnibus Objection to Claims](#) [Dkt. No. 858; filed September 21, 2023]
- E. [Order Granting Third \(Non-Substantive\) Omnibus Objection to Claims](#) [Dkt. No. 871; entered September 27, 2023]
- F. [Notice of Rescheduled Hearing](#) [Dkt. No. 890; October 20, 2023]
- G. [Certification of Counsel For Stipulation Resolving Plan Administrator Objections to Fannie Mae Proofs of Claim](#) [Dkt. No. 903; filed November 2, 2023]

Status: The Plan Administrator has reached an agreement with the claimant regarding item (A) and has submitted a stipulation under certification resolving the Plan Administrator's objection. An order has been entered as to all other claimants. Absent any questions from the Court, no hearing is necessary.

MATTERS GOING FORWARD:

- 2. [Fourth \(Substantive\) Omnibus Objection to Claims](#) [Dkt. No. 841; filed July 31, 2023]

Objection/Response Deadline: August 14, 2023 at 4:00 PM (ET); extended to August 28, 2023 at 4:00 PM (ET) only as to claimant Elizabeth McCafferty; extended to October 17, 2023 at 4:00 PM (ET) only as to claimant Barbara Ann Johnson.

Objections/Responses:

- A. Informal response from claimant Elizabeth McCafferty
- B. Informal response from claimant Richard Brockman
- C. Informal response from claimant Roderic and Sandra L Magie
- D. Informal response from claimant Barbara Johnson

Related Documents:

- E. [Notice of Submission of Proofs of Claim](#) [Dkt. No. 850; filed September 11, 2023]
- F. [Notice of Revised Proposed Order Granting Plan Administrator's Fourth \(Substantive\) Omnibus Objection to Claims](#) [Dkt. No. 859; filed September 21, 2023]
- G. [Plan Administrator's Reply to Barbara Johnson's Response to the Fourth \(Substantive\) Omnibus Objection to Claims](#) [Dkt. No. 861; filed September 21, 2023]
- H. [Notice of Additional Documents Received from Claimant Barbara Johnson](#) [Dkt. No. 865; filed September 26, 2023]
- I. [Notice of Additional Documents Received from Claimant Barbara Johnson](#) [Dkt. No. 873; filed September 28, 2023]
- J. [Certification of Counsel Regarding Fourth \(Substantive\) Omnibus Objection to Claims](#) [Dkt. No. 875; filed October 2, 2023]
- K. [Order Granting Fourth Substantive Omnibus Objection to Claims](#) [Dkt. No. 878; entered October 4, 2023]
- L. [Notice of Additional Documents Received from Claimant Barbara Johnson](#) [Dkt. 887; filed October 16, 2023]
- M. [Notice of Rescheduled Hearing](#) [Dkt. No. 890; October 20, 2023]

Status: The hearing on this matter will go forward with respect to claimant, Barbara Johnson. An order has been entered as to all other claimants.

3. [Fifth \(Substantive\) Omnibus Objection to Claims](#) [Dkt. No. 842; filed July 31, 2023]

Objection/Response Deadline: August 14, 2023 at 4:00 PM (ET); extended to September 12, 2023 at 4:00 PM (ET) only as to claimant Tennessee Department of Revenue

Objections/Responses:

- A. [Declaration of Noor Zainal Abidin Regarding Department of Taxation, State of Hawaii's Response to Debtors' Fifth \(Substantive\) Omnibus Objection to Claims](#) [Dkt. No. 844; filed August 14, 2023]
- B. Informal response from claimant Tennessee Department of Revenue
- C. Informal response from claimant Preston Lopez Jackson

D. [Response by the Tennessee Department of Revenue to the Fifth Omnibus Objection to Claims \(Non-Substantive\)](#) [Dkt. No. 852; filed September 12, 2023]

E. **Informal response from Fannie Mae**

Related Documents:

F. [Notice of Submission of Proofs of Claim](#) [Dkt. No. 851; filed September 11, 2023]

G. [Notice of Revised Proposed Order Granting Plan Administrator's Fifth \(Substantive\) Omnibus Objection to Claims](#) [Dkt. No. 860; filed September 21, 2023]

H. [Declaration of Amanda Swift in Further Support of Fifth \(Substantive\) Omnibus Objection to Claims](#) [Dkt. No. 880; filed October 11, 2023]

I. [Notice of Rescheduled Hearing](#) [Dkt. No. 890; October 20, 2023]

J. [Certification of Counsel For Stipulation Resolving Plan Administrator Objections to Fannie Mae Proofs of Claim](#) [Dkt. No. 903; filed November 2, 2023]

K. [Notice of Further Revised Proposed Order Granting Fifth \(Substantive\) Omnibus Objection to Claims](#) [Dkt. No. 904; filed November 2, 2023]

Status: The Plan Administrator has reached an agreement with the claimants referenced in items (A), (B), and (D) and filed a revised proposed order reflecting the resolution of those claims. The Plan Administrator has reached an agreement with the claimant regarding item (E) and has submitted a stipulation under certification resolving the Plan Administrator's objection to that claim. The hearing on this matter will go forward as to item (C) and all other claims originally subject to this objection.

4. [Motion by Texas Capital Bank for Entry of an Order to Release TCB's DIP Collateral](#) [Dkt. No. 874; filed October 2, 2023]

Objection/Response Deadline: October 16, 2023 at 4:00 PM (ET)

Objections/Responses:

A. [Reservation of Rights of the Plan Administrator Regarding Motion by Texas Capital Bank for Entry of an Order to Release TCB's DIP Collateral](#) [Dkt. No. 888; filed October 16, 2023]

- B. [Objection of Leadenhall Life Insurance Linked Investments Fund PLC and Leadenhall Capital Partners LLP to Texas Capital Bank's Motion for Entry of an Order to Release Certain DIP Collateral](#) [Dkt. No. 889; filed October 19, 2023]

Related Documents:

- C. [Notice of Rescheduled Hearing](#) [Dkt. No. 890; October 20, 2023]
- D. [Texas Capital Bank's Reply to Objection of Leadenhall Life Insurance Linked Investments Fund PLC and Leadenhall Capital Partners LLP to Texas Capital Bank's Motion for Entry of an Order to Release Certain DIP Collateral](#) [Dkt. No. 899; filed October 30, 2023]

Status: The hearing on this matter will go forward.

Dated: November 2, 2023

BLANK ROME LLP

/s/ Josef W. Mintz

Regina Stango Kelbon, Esq. (DE No. 5444)

Josef W. Mintz, Esq. (DE No. 5644)

Lawrence R. Thomas III, Esq. (DE No. 6935)

1201 Market Street, Suite 800

Wilmington, DE 19801

Telephone: 302.425.6400

Facsimile: 302.425.6464

Email: regina.kelbon@blankrome.com

josef.mintz@blankrome.com

lorenzo.thomas@blankrome.com

-and-

THOMPSON COBURN HAHN & HESSEN LLP

Mark S. Indelicato, Esq. (admitted *pro hac vice*)

Aleksandra Abramova, Esq. (admitted *pro hac vice*)

488 Madison Avenue

New York, New York 10022

Telephone: (212) 478-7200

Facsimile: (212) 478-7400

Email: mindelicato@thompsoncoburn.com

aabramova@thompsoncoburn.com

Co-Counsel for the Plan Administrator